UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN (GRAND RAPIDS)

IN THE MATTER OF:

RPS HOLDINGS, LLC,

Debtor.
_____________________________/

Bankruptcy Case No. 14-06545-jtg
Honorable John T. Gregg
Chapter 7

TRUSTEE'S MOTION FOR AUTHORITY TO SELL MISCELLANEOUS MEDICAL EQUIPMENT BY AUCTION PURSUANT TO 11 U.S.C. §363(b) AND FOR THE PAYMENT OF AUCTIONEER'S FEES AND EXPENSES

NOW COMES Trustee, Kelly M. Hagan, ("Trustee"), by and through her counsel, Beadle Smith, PLC, and hereby states for Trustee's Motion for Authority to Sell Miscellaneous Medical Equipment by Auction Pursuant to 11 U.S.C. §363(b) and for the Payment of Auctioneer's Fees and Expenses ("Motion") as follows:

1. On October 13, 2014, RPS Holdings, LLC, ("Debtor") filed a Voluntary Petition under Chapter 7 of the Bankruptcy Reform Act of 1978, as Amended, Title 11.

2. Subsequent to the aforementioned filing, Kelly M. Hagan was appointed the duly qualified and acting Trustee in this matter.

3. On the Petition Date, Debtor held an interest in approximately 100 defibrillatorsand other miscellaneous medical equipment ("Equipment") which the Auctioneer believes will bring a return at auction of approximately $20,000.00 to $30,000.00.

4. The Trustee seeks approval to sell the Equipment for the benefit of this bankruptcy estate pursuant to 11 U.S.C. §363(b).

5. The Trustee is in the process of hiring Repocast to assist the Trustee in liquidating the Equipment by conducting an auction on May 21, 2015 and is seeking court approval of its employment.

6. The Equipment may be inspected by any potential purchaser up until the date of the auction at Repocast located at 601 Gordon Industrial Ct. SW, Byron Center, MI 49315, during normal business days between the hours of 9 a.m. and 5 p.m.

7. The public auction shall be advertised by Repocast through their normal advertising means. In addition, Repocast will do additional marketing of the Equipment Auction at an expense not to exceed $1,500.00.

8. The Equipment will be sold to the highest qualified bidder as submitted at the public auction.

9. Prospective bidders may place bids for the Equipment by visiting the site 1800lastbid.com on April 30, 2015 or a later date advertised by Repocast.

10. Repocast is seeking a commission of 10% plus out-of-pocket expenses not to exceed $1,500.00 for marketing and $300.00 for pick up of the Equipment.

11. The sale of the Equipment shall be "as is, where is" and without any warranties.

12. Trustee believes that a sale of the Equipment via a public auction is in the best interest of the estate and creditors.

WHEREFORE, the Trustee requests this Honorable Court enter the Order submitted herewith granting the Trustee authority to sell the Equipment free and clear of all liens and encumbrances with any and all liens and encumbrances attaching to the proceeds of sale, if any, via a public auction to the highest qualified bidder, for the payment of fees and expenses of Repocast and for such other and further relief this Court deems just and proper.

Respectfully submitted,

BEADLE SMITH, PLC

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